

From: Richard Sumner - AQDX
To: (b) (6)
Cc: [Hether Krause - ENVX](#)
Subject: RE: Arlington Egg Ranch Emissions
Date: Thursday, January 08, 2015 2:51:00 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.jpg](#)
[140062.pdf](#)

Mr. Blackson,

First, my apologies for not interpreting your previous emails as a request to comment on the permit. Per our rules, the permit application was posted on our website for review by any interested parties. That said, even though the permit has been issued, it can still be reviewed. If there are material errors in the permit, it can be re-opened for cause and the appropriate changes incorporated. Please note that under the agricultural exemption any activities relating directly to the poultry operation are regulated by the Arizona Department of Environmental Quality. The permit issued by Maricopa County Air Quality Department only addresses the emergency engines on site. For your convenience, I have attached a copy of the permit.

For future communication I have asked Hether Krause to assist you. She was recently appointed to serve as our Citizen Advocate. Her phone number is 602.506.6707 and email is hkrause@mail.maricopa.gov

Richard A. Sumner, PE
Permitting Division Manager
Maricopa County Air Quality Department
1001 North Central Avenue, Suite 125
Phoenix, AZ 85004
Phone: 602-506-1842
Email: RichardSumner@mail.maricopa.gov



From: Daniel Blackson [mailto:(b) (6)]
Sent: Tuesday, January 06, 2015 12:05 PM
To: Richard Sumner - AQDX
Cc: Dan Blackson
Subject: Re: Arlington Egg Ranch Emissions

Mr. Sumner,

I did a public records request to acquire the report and information about the Tonopah Egg Ranch. It looks like a Non-Title V air quality permit was issued on November 17, 2014, is this correct? If so, what happened to my request for public comment?

Dan

On Dec 3, 2014, at 9:51 AM, Richard Sumner - AQDX <SumnerR@mail.maricopa.gov> wrote:

Dan,

The inspector is going through his record review and observations and preparing his report. I will let you know when it becomes available.

Richard A. Sumner, PE
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From: Dan [mailto:(b) (6)]
Sent: Monday, November 24, 2014 8:53 PM
To: Richard Sumner - AQDX
Subject: Re: Arlington Egg Ranch Emissions

Mr. Sumner,

Can you share what the inspector found?

Dan

Sent from my iPad

On Nov 24, 2014, at 4:30 PM, Richard Sumner - AQDX <SumnerR@mail.maricopa.gov> wrote:

Mr. Blackson,

I wanted to let you know that one of our inspectors went to the site last week. Thank you for the pictures and continued interest in the facility.

Richard A. Sumner, PE

Permitting Division Manager

Maricopa County Air Quality Department

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From: Daniel Blackson [mailto:(b) (6)]
Sent: Thursday, November 06, 2014 10:43 AM
To: Richard Sumner - AQDX
Subject: Re: Arlington Egg Ranch Emissions

Mr. Sumner,

I wanted to give you some additional information and again make an appeal for compliance action by the Maricopa County Air Quality Department.

First, I have attached pictures from September 16th showing that hens were delivered to the first chicken house at the Hickman Family Farms - Tonopah facility. A second chicken house is being or has been populated. With each chicken house holding 300,000+ hens, there is possibly 600,000+ hens at the facility. It is highly unlikely that the owners would not provide emergency power to protect their investment. Ventilation and cooling are a must for the hens to survive. Also, power is needed for feeding the hens; removing and processing eggs, and removing fecal and urine waste. As I cited in the email below, their Arlington facility has numerous emergency diesel generators and the same design feature must exist at the Tonopah facility.

Second, a new emergency diesel generator has been installed for Well 55-631793. A picture is attached. ADWR does not have a documented horsepower rating for the motor/pump, but it could be

greater than 250 HP.

Isn't this compelling information for the agency to do a followup inspection or inquiry?

Dan

From: Richard Sumner - AQDX <SumnerR@mail.maricopa.gov>
To: Daniel Blackson (b) (6)
Sent: Monday, August 11, 2014 4:27 PM
Subject: RE: Arlington Egg Ranch Emissions

Mr. Blackson,

We appreciate the heads up with regard to the new Hickman Family Farm facility in Tonopah. We will continue to monitor activities through onsite inspections and direct communications with the source to assure that all regulatory requirements are met.

Thank you for your continued interest in air quality issues.

Richard A. Sumner, PE

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From: Daniel Blackson (b) (6)
Sent: Thursday, July 31, 2014 11:35 AM
To: Richard Sumner - AQDX
Subject: Re: Arlington Egg Ranch Emissions

Richard,

The Tonopah egg factory is well into construction and I haven't heard anything about a public comment opportunity for an air quality permit. The chicken houses at this site are much larger than the chicken houses at the Arlington facility and it would be logical to assume that each of the chicken houses at the Tonopah egg factory would have emergency diesel generators. Air Quality Rule 200 requires permitting for internal combustion equipment greater than 250 HP. The Arlington facility has 16 emergency diesel generators greater than 250 HP, so it is likely that the Tonopah egg factory chicken houses will have emergency diesel generators greater than 250 HP.

Hickman Family Farms has a history of proceeding with their activities and projects and then using the goodwill and grace of the agencies to become compliant after the fact. I think that you can see this with their air quality regulatory compliance history and they are using the same technique with ADEQ's storm water and ADWR's groundwater regulations at the Tonopah egg factory.

I am concerned that the Tonopah egg factory will be put into operation without following the proper regulatory process and the community will miss their opportunity to provide public comment so public and environmental health and safety concerns can be addressed prior to initial operation. Even if the permitting process is applied after the fact, the owner will enjoy non-compliant operation in the interim and enjoy profits at the expense of the community and environment.

Will Maricopa County Air Quality Department be proactive in this situation and prevent initial facility operation if emergency diesel generators are installed without proper permitting? Or will the agency allow the facility to operate and bring them into compliance after the fact? It's not like Hickman Family Farms is unaware of regulatory requirements.

Dan Blackson

From: Richard Sumner - AQDX <SumnerR@mail.maricopa.gov>
To: Daniel Blackson (b) (6)
Cc: Rachel Danley - AQDX <RachelDanley@mail.maricopa.gov>
Sent: Tuesday, June 17, 2014 4:44 PM
Subject: RE: Arlington Egg Ranch Emissions

Mr. Blackson,

Your were correct about the report being too large – 2200 pages! It has some good information.

You note that emissions from the chicken houses are not specifically exempted by Maricopa County Air Quality Department regulations. However, this operation would fall into the category of normal farm cultural activity that is regulated by the Arizona Department of Environmental Quality and does not fall within our jurisdiction. We do regulate the “non-normal” components such as the engines and crematory.

Let us know if you have additional questions.

Richard A. Sumner, PE

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From: Daniel Blackson (b) (6)
Sent: Friday, June 13, 2014 7:32 PM
To: Richard Sumner - AQDX
Subject: Re: Arlington Egg Ranch Emissions

Richard,

Sorry that I hit the send button too soon. Here is the link for the EPA report:
<http://www.epa.gov/airquality/agmonitoring/pdfs/afobroilereemreport2012draft.pdf>

It seems that these chicken houses should be a source, especially when a facility will have over 300,000 chickens in a house and the houses in the study were 20,000 to 25,000. I would like to discuss this with you after you've had a chance to review the study.

Dan

From: Daniel Blackson (b) (6)
To: Richard Sumner - AQDX <SumnerR@mail.maricopa.gov>
Sent: Friday, June 13, 2014 7:26 PM
Subject: Re: Arlington Egg Ranch Emissions

Richard,

Thank you for the permit history and emissions information. I am puzzled why the chicken houses are not considered sources and did not find anything specific in the Maricopa County Air Quality Regulations to exempt them.

I'd like to share an EPA report with you. It is too large for me to attach so here is the link:

From: Richard Sumner - AQDX <SumnerR@mail.maricopa.gov>
To: Daniel Blackson (b) (6)
Cc: Rachel Danley - AQDX <RachelDanley@mail.maricopa.gov>
Sent: Friday, June 13, 2014 8:38 AM
Subject: RE: Arlington Egg Ranch Emissions

Mr. Blackson,

We have received your request below and are providing the enclosed table to address your emission question. With regard to the chicken houses, those are not considered to be sources under Maricopa County Air Quality Regulations. Therefore, no modeling or testing has been conducted.

PERMIT HISTORY:

Date Received	Revision Number	Description
10/15/2004	0.0.0.0	Submitted application for new permit to operate a crematory and emergency generators at the egg farm.
03/09/2011	0.0.1.0	Minor modification requested to add emergency generators and gasoline storage to the equipment list.
03/10/2011	1.0.0.0	Submitted permit renewal application.
10/11/2011	0.0.2.0	Minor modification requested to add a feed mill to the facility
12/07/2011	1.0.1.0	Minor modification requested to install a grain receiving and storage operation at the facility.
05/20/2013	1.0.2.0	Minor modification requested to add three emergency generators to the equipment list.

FACILITY WIDE ALLOWABLE EMISSIONS:

Pollutants	Engines	Feed Mill	Gasoline Storage	Facility wide Daily Emissions	Facility wide Annual Emissions
CO:	20,321 lbs/yr				20,321 lbs
NOx:	49,676 lbs/yr				49,676 lbs
PM2.5:	3,154 lbs/yr	10,000 lbs/yr		27 lbs	13,154 lbs
PM10:	3,154 lbs/yr	18,000 lbs/yr		49 lbs	21,154 lbs
PM	3,154 lbs/yr	44,000 lbs/yr		121 lbs	47,154 lbs
VOC:	6,631 lbs/yr		4,800 lbs/yr		11,431 lbs
SOX:	407 lbs/yr				407 lbs

Let us know if we can provide any additional information.

Richard A. Sumner, PE

Permitting Division Manager

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From: Daniel Blackson [mailto:(b) (6)]
Sent: Tuesday, June 03, 2014 3:48 PM
To: Richard Sumner - AQDX
Subject: Arlington Egg Ranch Emissions

Richard,

I have been going through the Arlington Egg Ranch records (Thanks for providing them through a public records request) and I'm not able to determine the emissions from the different sources or the facility as a whole. The application and modifications don't seem to be complete or maybe I didn't receive all the information. The Arlington Egg Ranch was built in multiple phases but the modifications to the permit are sparse and don't include emissions information for the equipment. According to Rule 220 Non-title Permit Provisions, Section 500 - Monitoring and Records there is a requirement for logging changes. Would this provide emissions information for the sources at the facility?

Also, there's quite a bit of information indicates that there is a variety of air pollutant emissions from the chicken houses. Are they considered a source? Has there been a performance test or modeling to demonstrate if a chicken house is a source or not?

Dan Blackson

(b) (6)